

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES OF) CLIFF MANOR, INC., INTEGRATED) HEALTH SERVICES AT RIVERBEND,) INTEGRATED HEALTH SERVICES AT) SOMERSET VALLEY, INC., ALPINE) MANOR, INC., BRIARCLIFF NURSING) HOME, INC., INTEGRATED HEALTH) GROUP, INC., SPRING CREEK OF IHS, INC.,) FIRELANDS OF IHS, INC., ELM CREEK OF) IHS, INC., and IHS LONG TERM CARE) SERVICES, INC.,) Plaintiffs,) v.) THCI COMPANY LLC,) Defendant,) v.) ABE BRIARWOOD CORPORATION and) JOHN DOES 1-10,) Additional Counterclaim) Defendants.)) Civil Action No. 04-910 (GMS)
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NOTICE TO TAKE DEPOSITION OF A NON-PARTY

PLEASE TAKE NOTICE that defendant THCI Company LLC will take testimony by deposition, upon oral examination, before a person authorized by the laws of the State of New York to administer oaths, on September 1, 2006, commencing at 10:00 a.m. at the office of Troutman Sanders LLP, The Chrysler Building, 405 Lexington Avenue, New York, NY 10174, and on any adjourned date thereof, and from day to day thereafter until completed, with respect to the subject matter of this action, at which time and place the deposition of Murray Forman will be taken.

in accordance with the attached Subpoena Duces Tecum. As counsel for Plaintiffs you are invited to attend and cross-examine.

CONNOLLY BOVE LODGE & HUTZ LLP



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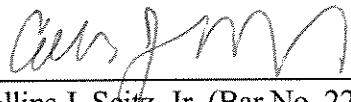
DATED: August 11, 2006

CERTIFICATE OF SERVICE

I, Collins J. Seitz, Jr., hereby certify that on the 11th day of August, 2006 a true and correct copy of the Notice to Take Deposition of a Non-Party was caused to be served by electronic mail on the attorney of record at the following address:

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